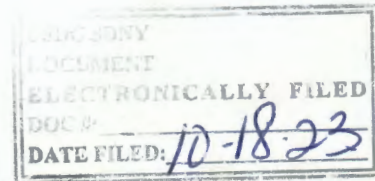


**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**



In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: 18-cv-04896.

MASTER DOCKET

18-md-2865 (LAK)

**STIPULATION AND ~~PROPOSED~~ ORDER OF VOLUNTARY DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The TKKJ LLC 401K Plan (“TKKJ Plan”) and Thomas Kertelits (“Kertelits”) hereby stipulate and agree that SKAT’s action against Defendants TKKJ Plan and Kertelits, captioned *Skatteforvaltningen v. The TKKJ LLC 401K Plan, et al.*, No. 18-cv-04896, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York  
October 10, 2023

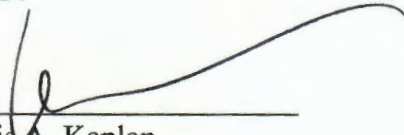
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*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*

*Counsel for The TKKJ LLC 401K Plan and  
Thomas Kertelits*

SO ORDERED:

  
\_\_\_\_\_  
Lewis A. Kaplan  
United States District Judge

10/18/23